

1 I-CHE LAI, ESQ.
2 Nevada Bar No. 12247
3 I-Che.Lai@wilsonelser.com
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP
4 300 South Fourth Street, 11th Floor
5 Las Vegas, Nevada 89101
6 Telephone: 702.727.1400
7 Facsimile: 702.727.1401

8 MICHAEL P. MCCLOSKEY, ESQ.
9 *Admitted Pro Hac Vice*
10 Michael.McCloskey@wilsonelser.com
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP
11 655 West Broadway, Suite 900
12 San Diego, California 92101
13 Telephone: 619.321.620
14 Facsimile: 619.321.6201
15 *Attorneys for Defendant Rudolf Steiner*
16 *Foundation, Inc., d/b/a RSF Social Finance*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 MERIDIAN OHC PARTNERS, LP, Case No. 2:16-cv-01161-JAD-(CWH)

20 Plaintiff,

21 vs.

22 MICHAEL A. DAVIS, an individual; and
23 RUDOLF STEINER FOUNDATION, INC.,
24 d/b/a RSF SOCIAL FINANCE, a New York
corporation,

25 Defendants.

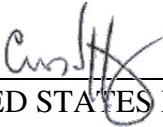
26 **STIPULATION AND ORDER TO RESPOND TO**
27 **THIRD AMENDED COMPLAINT [ECF NO. 75]**
28 **(First Request)**

29 Plaintiff Meridian OHC Partners, LP and defendants Michael A. Davis and Rudolf Steiner
30 Foundation, Inc., d/b/a RSF Social Finance (collectively, the “Parties”) hereby stipulate and agree to
31 extend the deadline for each defendant to respond to the Third Amended Complaint to May 15,
32 2018. The Third Amended Complaint, among other things, alleges that Mr. Davis and RSF Social

1 Finance, from at least 2011 forward, formed and acted as an undisclosed “group” within the meaning
2 of Section 13(d) of the Securities Exchange Act. (*See* ECF No. 75 ¶¶ 33-56.) This allegedly violated
3 section 13(d). (*See id.* ¶¶ 87-101.) RSF needs additional time to evaluate these allegations and to
4 prepare a responsive pleading. Defendants believe that it would be most efficient for both defendants
5 to remain on the same schedule for filing responsive pleadings and Davis, therefore, respectfully
6 requests that any extension given to RSF apply to Davis as well. Therefore, good cause exists for the
7 requested extension.

8 This proposed extension of the deadline for defendants to answer does not alter any other
9 dates in the Court’s April 19, 2018 Scheduling Order. (ECF No. 111.) In making this stipulation, the
10 parties each do not waive any of their respective legal or procedural rights, which are hereby
11 preserved.

12 IT IS SO ORDERED.

13 
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: May 3, 2018

16
17
18
19
20
21
22
23
24

DATED: May 3, 2018

/s/Patrick B. Griffin

James D. Boyle, Esq.
Nevada Bar No. 08384
Hanna S. Goodwin
Nevada Bar No. 13878
HOLLEY DRIGGS, WALCH
FINE WRAY PUZEY & THOMPSON
400 South Fourth Street, 3rd Floor
Las Vegas, Nevada 89101

Brian C. Buescher, Esq.

Admitted Pro Hac Vice

Patrick B. Griffin, Esq.

Admitted Pro Hac Vice

KUTAK ROCK LLP

1650 Farnam Street
Omaha, Nebraska 68102

*Attorneys for Plaintiff Meridian OHC
Partners, LP*

DATED: May 3, 2018

/s/Robert W. May

Anna Erickson White, Esq.
Admitted Pro Hac Vice
Robert W. May, Esq.
Admitted Pro Hac Vice
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482

Alex Fugazzi, Esq.

Nevada Bar No. 9022

V.R. Bohman, Esq.

Nevada Bar No. 13075

SNELL & WILMER, LLP

3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169

Attorneys for Defendant Michael A. Davis

DATED: May 3, 2018

/s/I-Che Lai

I-Che Lai, Esq.
Nevada Bar No. 12247
WILSON ELSER MOSKOWITZ
EDELMAN & DICKER, LLP
300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101

Michael P. McCloskey, Esq.

Admitted Pro Hac Vice

WILSON ELSER MOSKOWITZ

EDELMAN & DICKER LLP

655 West Broadway, Suite 900
San Diego, California 92101

*Attorneys for Defendant Rudolf Steiner
Foundation, Inc., d/b/a RSF Social Finance*